



Mail: P. O. Box 5231, Princeton, NJ 08543-5231
212 Carnegie Center, Suite 400
Princeton, New Jersey 08540
Tel 609.896.3600 Fax 609.896.1469
www.foxrothschild.com

CORINNE MCCANN TRAINOR
Direct No: 609.844.3038
Email: CTrainor@FoxRothschild.com

December 11, 2024

VIA ECF

Hon. Michael E. Farbiarz, U.S.D.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Pearson Education, Inc. v. Chegg, Inc.
Case No. 2:21-cv-16866 (MEF)(AME)

Dear Judge Farbiarz:

This firm represents Plaintiff Pearson Education, Inc. ("Pearson") in the above-referenced matter. We write jointly on behalf Pearson and Defendant Chegg, Inc. ("Chegg") to request a one-week adjustment to the briefing schedule for summary judgment and *Daubert* motions to facilitate the parties' efforts to settle their dispute.

Following a recent mediation, the parties have continued to work productively towards resolution. Pursuant to Your Honor's October 29, 2024 Order (ECF 180), summary judgment and *Daubert* motions are currently due tomorrow on December 12, 2024. The parties have met-and-conferred and believe that a one-week extension of the upcoming briefing deadlines will help facilitate resolution, and agreed upon the following proposed briefing schedule for motions for summary judgment and *Daubert* motions. The parties respectfully request that Your Honor adopt the below schedule extending tomorrow's deadline by seven (7) days:

- December 19, 2024: Affirmative motions
- January 29, 2025: Oppositions (unchanged)
- March 6, 2025: Replies (unchanged)

A Pennsylvania Limited Liability Partnership



Hon. Michael E. Farbiarz, U.S.D.J.

December 11, 2024

Page 2

Pursuant to L. Civ. R. 6.1, the parties respectfully submit that the following requests for similar extensions have been obtained. On June 23, 2023, following submissions by the parties, the Special Master set a deadline of July 30, 2024 for filing motions for summary judgment and *Daubert* motions (ECF 141). For good cause shown, on January 2, 2024, the Special Master extended the July 30, 2024 deadline for filing motions for summary judgment and *Daubert* motions to October 31, 2024 (ECF 149). On October 29, 2024, the parties requested and obtained the extension to the presently applicable deadlines described above so that the parties could attempt to resolve the dispute in a mediation involving the parties prior to expending additional party and judicial resources (ECF 179, 180).

With the hope that this request is acceptable to the Court, we have included a “So Ordered” provision at the end of this letter. We thank the Court for its consideration and courtesies.

Respectfully submitted,

/s/ Corinne McCann Trainor

Corinne McCann Trainor

cc: Hon. Jose L. Linares, U.S.D.J. (Ret.), Special Master
All Counsel of Record (via ECF)

SO ORDERED:

HONORABLE MICHAEL E. FARBIARZ, U.S.D.J.